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7 *Shawn Flynn*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 SHAWN FLYNN,

11 Plaintiff,

12 vs.

13 JAMES DZURENDA, et al.,

14 Defendants.

Case No. 2:19-cv-00213 MMD CLB

15 **(Proposed) JOINT DISCOVERY
PLAN AND SCHEDULING ORDER**

16 NATURE OF ACTION: USC 1983 Deliberate Indifference

17 TIME REQUIRED FOR TRIAL: Five Days

18 TRIAL DATE READY: 3/10/2021

19 **I. PROPOSED SCHEDULE**

20 1. Time required for discovery: Discovery will take substantially longer in this matter,
21 due to the HCV Class Action that will decide many of the issues in this matter. Therefore, all
22 discovery must be completed no later than **December 8, 2020**.

23 2. Amendment of pleadings and addition of parties: The deadline for filing motions to
24 amend the pleadings or to add parties shall be **October 12, 2020**.

25 3. Disclosure of expert witnesses: In accordance with Fed. R. Civ. Proc. 26(a)(2),
26 disclosures identifying experts shall be made sixty days prior to the discovery cut-off date, thus not
27 later than **October 12, 2020**. Disclosures of rebuttal experts shall be made thirty days after the
28 disclosure of initial experts and not later than **November 9, 2020**

1 4. Dispositive Motions: The parties shall have until sixty days after the close of
2 discovery to file dispositive motions thus not later than **February 8, 2021**.

3 5. Pre-trial order: If no dispositive motions are filed, the Joint Pretrial Order shall be
4 filed by **March 10, 2021**, which is no later than thirty days after the date set for the filing of
5 dispositive motions. In the event dispositive motions are filed, the date for filing the Joint Pretrial
6 Order shall be suspended until thirty days after the decision on the dispositive motions or by further
7 order of the court.

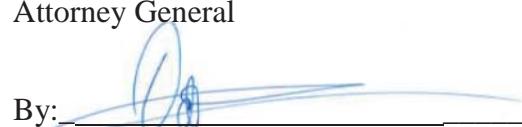
8 6. Extensions or modifications of the discovery plan and scheduling order: In
9 accordance with LR 26-4, any stipulation or motion for modification or extension of this discovery
10 plan and scheduling order must be made no later than twenty one days before the discovery cut-off
11 date and no later than **November 17, 2020**.

12 SO STIPULATED:

14 DATED this 26 day of June, 2020.

14 DATED this 26th day of June, 2020.

15 By:/s/ Frederick Melms
16 FREDERICK MELMS
17 PRO BONO ATTORNEY
18 *Attorney for the Plaintiff*

15 AARON D. FORD
16 Attorney General
17 
18 By: 
19 DOUGLAS R. RANDS
20 Senior Deputy Attorney General
21 *Attorneys for Defendants*

21 IT IS SO ORDERED.

22 Date: June 30, 2020

23 
24 United States Magistrate Judge

CERTIFICATE OF SERVICE

I certify that on June 26, 2020 , I electronically filed the foregoing, **(Proposed) JOINT DISCOVERY PLAN AND SCHEDULING ORDER**, via this Court's electronic filing system. Parties who are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, addressed to the following:

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